

# CENTENNIAL COMMUNICATIONS

3349 Route 148, Building A  
Wall, New Jersey 07719  
732-556-2200

November 10, 2006

Kris Monteith, Chief  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room 7-C723  
Washington, DC 20554

Catherine W. Seidel, Acting Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re:   Fifteenth Quarterly Report of  
      Centennial Communications Corp. on E911 Compliance**

Dear Ms. Monteith and Ms. Seidel:

Pursuant to the FCC's *Order to Stay* issued in CC Docket No. 94-102,<sup>1</sup> and the request of Commission staff, Centennial Communications Corp. ("Centennial") hereby voluntarily files this fourteenth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Centennial filed its last quarterly progress report on August 8, 2006. Because Centennial provides CMRS service both in and outside of the continental United States, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico and the U.S. Virgin Islands, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.<sup>2</sup>

## **I.     Puerto Rico/U.S. Virgin Islands**

---

<sup>1</sup>       FCC 02-210, released July 26, 2002.

<sup>2</sup>       See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Although Centennial initially deployed a network-based solution to effectuate E911 service in Puerto Rico, Centennial has since initiated a complete upgrade of its system there. As part of that overhaul, Centennial has upgraded from Lucent to Nortel switches, effectively replacing its entire network. Consequently, Centennial necessarily switched from a network- to a handset-based solution for the provision of E911 services, thus potentially increasing the overall system reliability and accuracy with which subscribers can be located in an emergency, through use of GPS-enabled devices in individual handsets.

A single PSAP serves Centennial's entire Puerto Rican service area. On November 4, 2003, Centennial received a request for Phase I and II E911 service from this sole PSAP. Centennial and the PSAP had been working towards deploying both Phase I and Phase II E911 service in Puerto Rico by July 15, 2004. However due to persistent equipment compatibility problems between Centennial and the PSAP, the parties agreed to extend the Phase II deployment target until August 20, 2004, and both Phase I and Phase II service has since been implemented via a network-based solution.

With respect to the switch to a handset-based solution, Centennial worked closely with the PSAP in Puerto Rico to make sure that the PSAP's needs were met as soon as practicable. Significantly, Centennial committed to maintaining its network-based E911 solution, concurrent with adapting to a handset-based solution, until December 31, 2006. The PSAP – Junta de Gobierno del Servicio 911 – has not indicated any objections to, or concerns with, Centennial's proposal. On November 3, 2005, Centennial notified the FCC of its change in solution to provide E911 service, and also requested a limited waiver of the December 31, 2005 95% penetration requirement set forth at 47 C.F.R. § 20.18(g)(1)(v) of the Commission's rules. In July 2006, Centennial advised the Commission that it had achieved a 95.55% GPS-capable handset penetration rate, and is in compliance with the FCC's rules for handset-based E911 solutions. As of October 17, 2006, the GPS-capable handset penetration rate had reached 97%.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however at this point, neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

### **Domestic Markets**

Through five different subsidiaries,<sup>3</sup> Centennial now holds licenses to provide digital cellular and PCS service in 34 markets in the Midwest and Southern United States. Centennial provides CMRS in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial utilizes TCS as its E911 partner and has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.<sup>4</sup>

**Phase I Service** – Centennial continues to make significant progress initiating Phase I service to PSAPs. To date, we have initiated Phase I E911 service to 148 PSAPs in our domestic markets. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our Indiana, Michigan and Texas markets. Centennial also notes that, to date, we have received three valid requests for Phase I E911 service from PSAPs in the state of Ohio. We have deployed Phase I service in Defiance County. The Paulding County, OH PSAP experienced equipment implementation issues, which were recently resolved, and that PSAP is now ready to receive Phase I data. Finally, we have received requests for Phase I service from PSAPs in Williams County, Ohio and Winn Parish, Louisiana, and plan to implement Phase I service to both PSAPs by March 2007.

**Phase II Service** - We are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets. Since the filing of our last quarterly report, Centennial has activated two new PSAPs to Phase II compliance (Paulding County, Ohio and Port Gibson/Claiborne, MS). In total, we have integrated eighty-three PSAP markets into a "Live" status, and we have six markets in various stages of the implementation process.

As we previously reported, Centennial experienced deployment difficulties in four central Michigan counties - Gladwin, Gratiot, Ogemaw, and Roscommon - due to lack of cell site density. Centennial has since been successful in initiating service in Gladwin and Gratiot counties; however, we continue to experience difficulty in Roscommon and Ogemaw. While implementation was attempted, it was unsuccessful due to accuracy issues. (In order to complete triangulation, non-radio equipped sites are strategically placed in order to locate distress calls.) In order to

---

<sup>3</sup> Bauce Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

<sup>4</sup> See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

improve accuracy to an acceptable level in all four listed Michigan counties, we are making site adjustments and deploying equipment at five Phase II GEO-only sites. Since our last report, equipment deployment has been completed at three of the GEO-only sites, and we have commenced hardware installation for Roscommon and Ogemaw counties. In addition, we have finalized site acquisition for the two additional GEO-only sites, and construction will begin at those sites by the end of 2006. While this is a time-consuming process, which is further complicated by the lack of cell tower sites in the region, we remain in regular contact with the affected PSAP directors, and they have not objected to our revised deployment schedule.

Centennial has successfully integrated all Texas PSAPs to Phase II status that have requested Phase II service. Presently, we have no pending Phase II E911 service requests for Ohio and two pending Phase II requests from PSAPs in Mississippi. The Paulding County, Ohio PSAP just completed their equipment upgrade to accept Phase II data and implementation was completed on November 7. The Defiance County, OH PSAP has rescinded its Phase II request due to equipment issues. In Mississippi, Phase II service was successfully implemented to the Claiborne/Port Gibson PSAP in mid-October. The Lincoln County PSAP is scheduled for deployment this month and the Simpson County PSAP is scheduled for March 2007. Finally, Centennial has pending requests from PSAPs in Newton, IN and Tangipahoa Parish, LA. Centennial continues to work cooperatively with PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, Centennial is presently in compliance with all applicable Phase II deployment benchmarks, either through meeting the six-month deadline, or negotiating mutually acceptable alternative deployment dates. Phase I & II implementation remain a high priority with Centennial in each of the PSAP's in its domestic markets. Centennial will continue to work cooperatively with PSAPs to deliver the requested service in a timely and efficient manner.

### **III. Affidavit**

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me.

Sincerely,

Kris Monteith  
Catherine W. Seidel  
November 10, 2006  
Page 5

/s/ William Roughton

William Roughton  
Vice President, Legal and Regulatory

Affairs

**Centennial Communications Corp.**

cc: John Ramsey, Executive Director  
Association of Public-Safety Communications  
Officials-International, Inc.  
351 N. Williamson Blvd.  
Daytona Beach, FL 32114

Steven Marzolf, President  
NASNA  
VITA/Division Public Safety Communications  
110 S. 7<sup>th</sup> Street  
Suite 135  
Richmond, VA 23219-3931

Robert M. Gurss  
Director, Legal & Government Affairs  
APCO International  
1725 DeSales Street, NW, #808  
Washington, DC 20036

James R. Hobson  
Miller & Van Eaton, PLLC  
1155 Connecticut Avenue, NW, Suite 1000  
Washington, DC 20036  
Counsel for NENA

Terry Peters, Executive Director  
NENA  
4350 N. Fairfax Drive  
Suite 750  
Arlington, VA 22203-1695